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December 19, 2011

Via Electronic Filing

Honorable Ann Marie Donio, USMJ
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

RE: Maryanne Cottrell and Richard Holland v. Zagami, LLC
Docket No: 08-cv-3340 (JEI)

Dear Judge Donio:

This office is writing further on behalf of Zagami, LLC with regard to dispositive motion practice for the above-referenced matter. This office previously requested additional time, after which the Court set a date of December 16, 2011. On December 16, 2011, this office filed a Motion for Reconsideration which is dispositive in nature and would thus terminate the case if granted.

Further, this office has been preparing and has substantially completed a summary judgment motion in the event that the case is not resolved as a result of the foregoing motion. However, this office was not able to also file this motion by December 16, 2011, and respectfully requests that the Court permit the filing of this motion on or before December 21, 2011.

Respectfully submitted,
Nash Law Firm LLC

/s/ Alan Reuter
Alan A. Reuter, Esq.

cc: Wesley G. Hanna, Esquire (via electronic filing)
Melissa Kanbayashi, Esq. (via electronic filing)